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CCM USAO#2025R00190

USDC - BALTIMORE
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

JACQUE BROWN,
a/k/a "Hammer,"

Defendant.

UNDER SEAL

Criminal No.

(Possession with Intent to Distribute
Controlled Substances, 21 U.S.C.
§ 841(a); Possession of a Firearm by
a Prohibited Person, 18 U.S.C. §
922(g)(1); Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime, 18 U.S.C. § 924(c); Aiding
and Abetting, 18 U.S.C. § 2;
Forfeiture, 18 U.S.C. § 924(c), 21
U.S.C. § 853, and 28 U.S.C.
§ 2461(c))

INDICTMENT

COUNT ONE

(Possession with Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland charges that:

On or about April 8, 2025, in the District of Maryland, the Defendant,

JACQUE BROWN,
a/k/a "Hammer,"

did knowingly and intentionally possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide, commonly called fentanyl, a Schedule II controlled substance, a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1), § 841(b)(1)(A), and § 841(b)(1)(C)

COUNT TWO
(Possession of a Firearm by a Prohibited Person)

The Grand Jury for the District of Maryland further charges:

On or about April 8, 2025, in the District of Maryland, the Defendant,

JACQUE BROWN,
a/k/a “Hammer,”

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed two firearms, to wit: a Luger Walther P.38 9mm handgun, bearing serial number 7272J; and a 12-gauge Maverick model 88 pump action shotgun, bearing serial number MV39342V, and both firearms were in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT THREE
(Possession of a Firearm in Furtherance of Drug Trafficking)

The Grand Jury for the District of Maryland further charges:

On or about April 8, 2025, in the District of Maryland, the Defendant,

JACQUE BROWN,
a/k/a “Hammer,”

did knowingly possess two firearms, to wit: a Luger Walther P.38 9mm caliber handgun, bearing serial number 7272J; and a 12-gauge Maverick model 88 pump action shotgun, bearing serial number MV39342V, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 841, as alleged in Count One of this Indictment, which is incorporated herein by reference.

18 U.S.C. § 924(c)
18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendant's convictions under Counts One through Three of this Indictment.

Narcotics Forfeiture

2. Upon conviction of the offense alleged in Count One of this Indictment, the Defendant,

**JACQUE BROWN,
a/k/a "Hammer,"**

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

Firearm and Ammunition Forfeiture

3. Upon conviction of the offenses alleged in Counts Two or Three of this Indictment, the Defendant,

**JACQUE BROWN,
a/k/a "Hammer,"**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in such offenses.

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to:
- a. a forfeiture money judgment in the amount of proceeds the Defendant obtained as a result of the offense alleged in Count One of this Indictment;
 - b. a Luger Walther P.38 9mm caliber handgun, bearing serial number 7272J; and
 - c. a 12-gauge Maverick model 88 pump action shotgun, bearing serial number MV39342V.

Substitute Assets

5. If, as a result of any act or omission of the Defendant, any of the property described above as being subject to forfeiture:

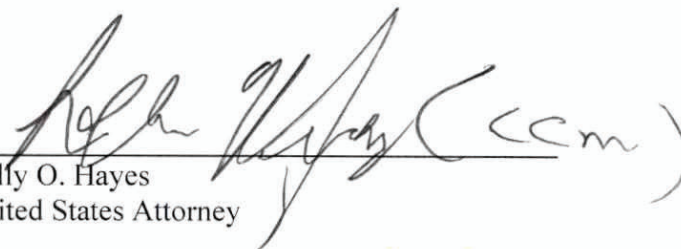
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)

21 U.S.C. § 853

28 U.S.C. § 2461(c)



Kelly O. Hayes
United States Attorney

A TRUE BILL: 11

SIGNATURE REDACTED -

For person

6/18/25

Date